

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICTS OF MICHIGAN**

----- X  
JERIMY SCHILZ, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

FORBES MEDIA, LLC,

Defendant.  
----- X

Case No. 2:21-cv-11796-GAD-APP

Honorable Gershwin A. Drain  
Magistrate Judge Anthony P. Patti

**STIPULATION FOR EXTENSION OF TIME TO  
RESPOND TO CLASS ACTION COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiff and Defendant that the time for Defendant to answer, move against or otherwise respond to the Complaint is hereby extended up to and including December 3, 2021.

Dated: October 15, 2021

By: /s/ Philip L. Fraietta (with consent)

Philip L. Fraietta

BURSON & FISHER, P.A.

888 Seventh Avenue

New York, New York 10019

Tel: (646) 837-7150

Email: pfraietta@bursor.com

*Attorney for Plaintiff*

By: /s/ J. Michael Huget

J. Michael Huget (P39150)

HONIGMAN LLP

315 E. Eisenhower Parkway

Suite 100

Ann Arbor, MI 48108

Tel: (734) 418-4254

Email: mhuget@honigman.com

Sharon Schneier  
Sean Sullivan  
DAVIS WRIGHT TREMAINE LLP  
1251 Avenue of the Americas  
21st Floor  
New York, NY 10020-1104  
Tel: (212) 489-8230  
Email: [sharonschneier@dwt.com](mailto:sharonschneier@dwt.com)  
[seansullivan@dwt.com](mailto:seansullivan@dwt.com)

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I certify that on October 15, 2021, I caused the foregoing document to be filed with the Clerk of the Court via the CM/ECF system, which will cause notice of same to be sent to all counsel of record.

By: /s/ J. Michael Huget  
J. Michael Huget (P39150)  
HONIGMAN LLP  
315 E. Eisenhower, Suite 100  
Ann Arbor, MI 48108  
(734) 418-4254  
[mhuget@honigman.com](mailto:mhuget@honigman.com)

*Attorneys for Defendant*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICTS OF MICHIGAN**

----- X  
JERIMY SCHILZ, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

FORBES MEDIA, LLC,

Defendant.  
----- X

Case No. 2:21-cv-11796-GAD-APP

Honorable Gershwin A. Drain  
Magistrate Judge Anthony P. Patti

**[PROPOSED] ORDER EXTENDING TIME FOR DEFENDANT  
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Upon consideration of the stipulation filed by the parties, it is  
ORDERED that the deadline by which Defendant has to respond to Plaintiff's  
Complaint, filed August 4, 2021, is extended to and including December 3, 2021.

s/Gershwin A. Drain

Gershwin A. Drain

U.S. DISTRICT JUDGE

Dated: October 15, 2021